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August 24, 2011

**BY ECF**

The Honorable Joseph F. Bianco  
United States District Judge  
Eastern District of New York  
100 Federal Plaza  
Central Islip, New York 11722

Re: Herma Robinson v. Zurich American Insurance Company & Jennifer Robbie  
U.S.D.C., E.D.N.Y., No. 10 Civ. 3926 (JFB) (KT)

Dear Judge Bianco:

As you know, this Firm represents Zurich American Insurance Company ("Zurich") and Jennifer Robbie ("Robbie") (collectively, "Defendants") in the above-referenced action. We write in accordance with Your Honor's Individual Motion Practices to request an adjournment of the pre-motion conference currently scheduled for September 6, 2011, at 2:00 p.m. Due to scheduling conflicts, counsel for Defendants are not available on September 6, 2011. Accordingly, Defendants respectfully request that the pre-motion conference be rescheduled for a date and time convenient to the Court. We have conferred with Plaintiff's counsel and they consent to the adjournment. For the Court's convenience, both Plaintiff's and Defendants' counsel are available on September 7 after 1 p.m., September 9 all day, and September 13, 2011, all day.

This is the first request for an adjournment of the conference.

Thank you for Your Honor's consideration.

Respectfully submitted,

SEYFARTH SHAW LLP

A handwritten signature in black ink, appearing to read "Hema Chatlani".

Hema Chatlani

cc: Robert J. Valli, Jr., Esq. (via ECF)  
Peter A. Walker, Esq.  
Lori M. Meyers, Esq.

